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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 14-00284 JD
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	CONTINUING STATUS HEARING DATE AND
v.)	EXCLUDING TIME UNDER THE SPEEDY TRIAL
)	ACT
JOHNNY QUIANG PANG,)	
)	
)	
Defendant.)	
_____)	

The undersigned parties respectfully request that the status appearance scheduled for September 26, 2014 be continued to October 24, 2014. The reason for the continuance is that the government recently provided defense counsel with additional discovery, including a copy of a search warrant affidavit and an inventory list of items seized from the defendant's business. This case involves alleged trafficking in counterfeit goods, and the parties need additional time to research the loss amounts and discuss them. Furthermore, the parties agree and stipulate that an exclusion of time under the Speedy Trial Act from September 26, 2014 to October 24, 2014 is appropriate based on the defendant's need for effective

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STIPULATION AND ~~PROPOSED~~ ORDER
CR 14-00284 JD

1 preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv).

2 SO STIPULATED:

3 DATED: 9/23/14

MELINDA HAAG
United States Attorney

4
5 /s/
SUSAN KNIGHT
Assistant United States Attorney

6
7 DATED: 9/23/14

8 /s/
JOHN PAUL REICHMUTH
Assistant Federal Public Defender
Counsel for Mr. Pang

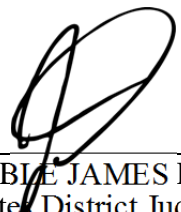
ORDER

Accordingly, for good cause shown, the Court HEREBY ORDERS that the status hearing scheduled for September 24, 2014 at 1:30 p.m. be continued to **October 17, 2014** at 1:30 p.m. in Courtroom 11 of the San Francisco Courthouse.

The Court FURTHER ORDERS that time be excluded under the Speedy Trial Act from September 26, 2014 through October 17, 2014. The Court finds, based on the aforementioned reasons, that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial. The failure to grant the requested continuance would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice, because the government recently provided defense counsel with additional discovery, including a copy of a search warrant affidavit and an inventory list of items seized from the defendant's business. This case involves alleged trafficking in counterfeit goods, and the parties need additional time to research the loss amounts and discuss them. The Court therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

SO ORDERED.

DATED: September 25, 2014



HONORABLE JAMES DONATO
United States District Judge